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15 NICOLAS FORCILLO

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 DARLENE ISAAC; and HAROLD ROLAND
19 HOWMAN, JR.,

20 Plaintiffs,
21 vs.

22 NICOLAS FORCILLO, an individual,
23 WERNER ENTERPRISES, INC., a foreign
24 corporation, DOES I through X, inclusive;
25 and/or ROE CORPORATIONS I through X,
26 inclusive

27 Defendants.

28 CASE NO. 2:19-CV-01452-KJD-BNW

29 **STIPULATION AND ORDER TO**
30 **CONTINUE THE JOINT PRETRIAL**
31 **ORDER DEADLINE**

32 **(First Request)**

33 The parties respectfully request the Court's permission to continue the Joint Pretrial
34 Order deadline currently set for January 5, 2022.

35 **I. BACKGROUND**

36 The Joint Pretrial Order deadline of January 5, 2022 was set by Court Order [Doc. No.
37 67]. The Court has not yet set trial or a pre-mediation settlement conference in this matter.

38 The parties respectfully request a one (1) week continuance of the deadline in order to
39 complete the Joint Pretrial Order from January 5, 2022 to January 12, 2022.

40 This request is being made due to the Christmas and New Year holidays; as well as,
41 defense counsel preparing for a trial that was set for January 3, 2022 (Sines v Valley Health and

1 Allied Universal, Case No. A-19-787286-C, Dept. XXII) and having to be on the East Coast in
2 New York the second half of December due to family issues and illness (undersigned Defense
3 counsel's parents). Plaintiff counsel, Matthew Pfau, Esq. was also preparing for trial in the
4 matter of Gray v. Fogg, which began on January 3, 2022, and is currently in trial. Further, this
5 case involves two Plaintiffs who treated in multiple differing states leading to substantial medical
6 records, which in turn is leading to a potentially large number of exhibits and documents within
7 exhibits, and the parties require additional time to attempt to work on objections and or
8 stipulations due to the volume of case data.

9 In addition, the parties are working on coordinating three proposed trial dates and at this
10 point would not have a trial date earlier than April 25, 2022 such that a one-week extension
11 would impact a trial setting with this Court.

12 Counsel for the parties are attempting to agree upon three agreeable trial dates and at
13 present the earliest potential trial date may be late April 2022, and more likely a later month in
14 2022, therefore, the undersigned counsel submit that the one week extension requested herein
15 should not impact other pre-trial requirements.

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1 **II. CONCLUSION**

2 The parties submit this Stipulation to continue the deadline for filing the Joint Pretrial
3 Order from January 5, 2022 to January 12, 2022 in good faith and not to delay this litigated
4 proceeding; and, ask this Honorable Court to grant this Stipulation.

5 Dated this 4th day of January 2022.

6 H&P LAW

7 */s/ Marjorie L. Hauf*

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15 DARLENE ISAAC and
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5 Dated this 4th day of January 2022.

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8 */s/ Michael C. Hetey*

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18 NICOLAS FORCILLO

19 **ORDER**

20 IT IS SO ORDERED.

21 DATED: 1/5/2022

22 
23 UNITED STATES MAGISTRATE JUDGE